

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS, EASTERN DIVISION

SEQUOIA Y. WALKER, as Guardian for, ROBERT
LOUIS WALKER,

Plaintiff,

v.

DALI TRANSPORTATION, LLC,

Defendant.

No.21-cv-6473

NOTICE OF REMOVAL

NOW COME the Defendant, DALI TRANSPORTATION, LLC, by its attorney, Joseph A. Panatera of CASSIDAY SCHADE LLP, and for its Notice of Removal states as follows:

1. Plaintiff filed a Complaint in the Circuit Court of Cook County, Illinois, on November 3, 2021, as the result of a motor vehicle accident that occurred on November 30, 2020. (*See* a copy of Plaintiffs' Complaint attached hereto as **Exhibit A**).

2. The Defendant named in Plaintiff's Complaint is DALI TRANSPORTATION, LLC. *See Ex. A*.

3. The Summons was issued to DALI TRANSPORTATION, LLC on November 4, 2021. (*See* a copy of the Summons attached hereto as **Exhibit B**). The Summons was served on November 15, 2021.

4. This notice is filed within thirty (30) days after service of the Summons and Complaint pursuant to 28 USC 1446(b)(1).

5. At the time this action was commenced, and since then, Defendant, DALI TRANSPORTATION, LLC, had one member, Mr. Jurat Takhirov. Mr. Takhirov is and at the time of the accident at issue was a resident and citizen of the State of Florida. (*See* Affidavit of Mr. Jurat Takhirov., attached hereto as **Exhibit C**).

6. Upon information and belief, at the time the action was commenced and since then, Plaintiff has been a citizen of the State of North Carolina. (*See* the South Carolina Traffic Collision Report attached as **Exhibit D**).

7. Diversity of Citizenship remains among the parties to this action.

8. Upon information and belief, Plaintiff allegedly suffered severe and permanent injuries and significant damages as a result of the accident at issue, including medical bills in excess of \$300,000 and injuries severe enough to require Plaintiff to need a guardian appointed. *See Ex. A.*

9. This action is a civil one in which the United States District Courts have original jurisdiction under 28 USC 1332.

10. Attached are copies of the Summons, Complaint, and Letters of Appointment of General Guardian. These documents are all of the pleadings, process and orders that have been served on DALI TRANSPORTATION, LLC.

WHEREFORE, Defendant, DALI TRANSPORTATION, LLC, prays that this cause be removed to the United States District Court for the Northern District of Illinois.

Respectfully submitted,

CASSIDAY SCHADE LLP

By: /s/Joseph A. Panatera
One of the Attorneys for Defendant, DALI
TRANSPORTATION, LLC

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